

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GENX INTERNATIONAL, INC. and
IVFONLINE.COM, LLC,

Plaintiffs,

v.

JEREMY JOHNSON and
REFROMEDIX CORP.,

Defendants.

CIVIL ACTION NO. 05-10419DPW

AUGUST 22, 2005

JOINT STATEMENT
PURSUANT TO LOCAL RULE 16.1(D)

Pursuant to Local Rule 16.1(D), the parties in the above action submit this Joint Statement in advance of the scheduling conference set for August 30, 2005 at 2:30 p.m.

(1) **Joint Discovery Plan**

The parties propose the following discovery plan:

- (a) Initial disclosures shall be made by September 15, 2005.
- (b) Written discovery requests shall be served by December 16, 2005.
- (c) Fact depositions shall be completed by June 2, 2006.
- (d) Initial expert reports shall be served by March 1, 2005.
- (e) Rebuttal expert reports shall be served by May 5, 2006.
- (f) Expert depositions shall be completed by July 1, 2006.

(2) **Proposed Motion Schedule**

The parties propose the following schedule for filing motions:

- (a) Motions to amend pleadings and/or add parties shall be filed by November 1, 2005.

(b) Motions for summary judgment shall be filed by September 1, 2006.

(3) Certifications

The parties have filed their Local Rule 16.1(D)(3) certifications separately.

Respectfully submitted,

**GENX INTERNATIONAL, INC. and
IVFONLINE, LLC,**

**JEREMY JOHNSON and
REPRODIX CORP.,**

By their Attorneys,

By their Attorneys,

/s/ Glenn A. Duhl
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Dated: August 22, 2005